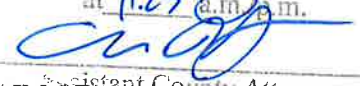


EXHIBIT C

This paper received at the
 Erie County Attorney's Office
 from Rich Harrington on
 the 2nd day of March, 2023
 at 11:25 a.m.

 Assistant County Attorney

EXHIBIT

001

MTT 05/22/2023

IN THE MATTER OF THE CLAIM OF
 Megan McKay
 -Against-
 COUNTY OF ERIE

TO: Erie County Attorney
 95 Franklin Street
 Room 1634
 Buffalo, NY 14202
 erieclaims@erie.gov

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demand against COUNTY OF ERIE as follows:

1. **The name and post-office address of each claimant and claimant's attorney is:**

Megan McKay
 603 Flagstone Ct.
 Oshawa, ON L1K 2Z8, Canada

Morgan & Morgan, NY, PLLC
 350 Fifth Avenue, Suite 6705
 New York, NY 10118
 (212) 801-4505

2. **The nature of the Claim:** Personal injuries with pain and suffering, medical and hospital expenses, loss of enjoyment of life, and related damages and expenses on behalf of the claimant due to the negligence of the respondents.

3. **The time when, the place where, and the manner in which the claim arose:** This occurrence took place on January 22, 2023, at the Highmark Stadium located at 1 Bills Dr., Orchard Park, NY 14127. Claimant was heading towards the restroom when she slipped and fell due to an accumulation of water and snow.

Claimant its agents, servants, and/or employees were negligent, careless, and reckless in the ownership, maintenance, operation, supervision, inspection, and control of the subject premises; in failing to avoid the aforesaid incident which was foreseeable; Failure to remove or warn of the presence of water on the ground, despite knowing or should have known of the hazardous condition; Failure to provide slip-resistant mats or material on surfaces that are prone to becoming wet or slippery, such as the area where the incident occurred; Failure to maintain or replace existing mats or slip-resistant material that had worn down or become ineffective over time; Failure to install drainage systems or take other measures to prevent water from accumulating in the area; Failure to properly maintain gutters, downspouts, and other drainage systems, which can result in water overflow, and in being otherwise negligent, careless, reckless and grossly negligent.

4. **The items of damage or injuries claimed are:** Monetary damages for personal injuries; pain and suffering; past, present, and future medical expenses; hospital expenses, and loss of earnings, and related expenses on behalf of the claimant due to the negligence of the respondent. Claimant became sick, sore, lame and disabled; suffered severe and permanent personal physical injuries, disabilities, cosmetic deformity, medical and hospital expenses, and extensive pain and suffering.

Claimant required hospitalization and medical care and treatment and will require further hospital and medical care in the future; has been and will continue to be incapacitated from his usual activities of daily living including lost wages; has incurred medical, hospital, and related expenses; has sustained an injury of a permanent nature and will be permanently impaired as a result of said accident.

Claimant is currently under medical care and treatment and will require further medical care, the extent of which is unknown at this time. Claimant also sustained loss of enjoyment of life as a result of said injuries. This claim is also for pain and suffering, economic damages and medical and medically related expenses.

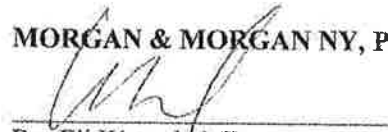
Specifically, Claimant sustained injuries to including but not limited to a fractured fibula requiring emergency medical treatment, extensive follow-up treatment, restricted range of motion, stiffness, and necessity of future medical procedures. The Claimant required hospitalization and medical care and will require further hospital and medical care in the future and caused Claimant to incur and continue to incur expenses for medical attention and treatment. Claimant reserves the right to amend this section after review of his medical records.

TOTAL AMOUNT CLAIMED: \$1,000,000.00

The undersigned claimants therefore present this claim for adjustment and payment. You are hereby notified that unless said claim is adjusted and paid within the time provided by law from the date of presentation to you, the claimant intends to commence an action on this claim.

Dated: New York, New York
March 1, 2023

MORGAN & MORGAN NY, PLLC


By: Eli Wagschal, Esq.

Attorneys for Plaintiffs

350 Fifth Avenue, Suite 6705

New York, NY 10118

(212) 801-4505

ewagschal@forthepeople.com

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:

I, the undersigned, an attorney duly admitted to practice in the Courts of New York State, state that I am the attorney of record in the within action; I have read the foregoing notice of claim which are true to my own knowledge, except as to those facts stated to be alleged upon information and belief, and as to those matters, I believed it to be true.

This verification is made by the undersigned and not by the plaintiff because plaintiff resides in a county other than the county in which the undersigned attorney maintains offices. The grounds to my belief as to all matters not stated upon my own knowledge are as follows:
Investigations and records maintained in file.

I affirm that the foregoing statements are true, under the penalties of perjury.

Dated: New York, New York
March 1, 2023



ELI WAGSCHAL, ESQ.